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NEW YORK GAS GROUP

515 BROADWAY • 43rd FLOOR • NEW YORK, N.Y. 10036-5701
TEL: 212 354-4790 • FAX: 212 764-7014 • Website: www.nygaz.org

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MEMBERS Dockets Facility
United States Department of Transportation
Room PL -401

Central Hudson Gas
and Electric Corp. 400 7th St., S.W.
Consolidated Edison Co
of N.Y., Inc. Washington, DC 20590-000 1

Corning Natural Gas Corporation
Re: Docket No. RSPA-99-6355¹⁷; Notice 1

KeySpan Energy Corporation
National Fuel Gas Distribution Corp.
New York State Electric and Gas Corp.
DOT's Notice of Public Meeting and Request for Comment Regarding Pipeline Safety: Enhanced Safety and Environmental Protection for Gas Transmission and Hazardous Liquid Pipelines in High Consequence Areas (as issued on October 21, 1999 in the Federal Register)

Niagara Mohawk Power Corp.
Orange and Rockland Utilities, Inc.
Rochester Gas and Electric Corporation
St. Lawrence Gas Company, Inc.
The New York Gas Group (NYGAS) is the New York State natural gas utility trade association whose 10 members are the largest local gas distribution companies (LDCs) in the state. These ten members are: Central Hudson Gas and Electric Corp., Consolidated Edison Co. of N.Y., Inc., Corning Natural Gas Corp., National Fuel Gas Distribution Corp., New York State Electric and Gas Corp., Niagara Mohawk Power Corp., Orange and Rockland Utilities, Inc., Rochester Gas and Electric Corp., St. Lawrence Gas Company, Inc., and KeySpan Energy Corp.

NYGAS has reviewed DOT's Notice of Public Meeting and Request for Comments Regarding Enhanced Safety and Environmental Protection for Gas Transmission and Hazardous Liquid Pipelines in High Consequence Areas, published on October 21, 1999 and has the following comments to offer. Please note that NYGAS believes that its comments are generally consistent with the observations made by AGA and supports AGA's position.

1. The docket in question suggests that each pipeline segment operating in a high consequence area should be subjected to intelligent, in-line inspection, regardless of the relative risk level associated with that pipeline. Alternatively, NYGAS advocates an approach where a relative risk assessment on the pipeline is conducted, then, depending upon the risk level, decide which mitigative/inspection strategy should be employed.

2. The New York State LDCs through NYGAS have been working with the New York State Public Service Commission to develop a pipeline integrity program which will assess the relative risk of transmission pipeline segments. This effort appears to be basically aligned with the approach outlined by OPS except that in the NYGAS effort, the relative risk of the pipeline segments is assessed as a first step, followed by determining the appropriate mitigative step, if any, that is required to bring the pipeline to an acceptable risk level.
3. In-line inspection, such as smart pigging, and hydrostatic testing could be impractical and cost prohibitive due to the configuration of many of the systems operated by the NYGAS companies. This is not **only** because of a lack of launching and receiving facilities, but also because of the construction and internal restrictions of the pipelines, the unsatisfactory performance of these tools at the internal pressure levels encountered in most of these systems, and the many miles of pipeline that represent a sole supply source.

As part of a normal maintenance program, the NYGAS companies utilize a variety of mechanisms/tools to assess the integrity of the system, **eg**, close interval surveys, review of leak data, corrosion control records, patrolling data, exposed pipe examination records, etc.

4. As **intra-state** transmission operators, we are regulated by the New York State Public Service Commission and have developed a working relationship to promote pipeline safety in the most effective and efficient manner. Any pipeline integrity regulation must provide enough flexibility to allow this to continue.
5. The total pipeline mileage for the New York State LDCs is relatively small. All of the companies put together represent a transmission pipeline mileage that would constitute only 5 to 10 percent of the pipeline mileage of one of the major cross-country transmission systems.

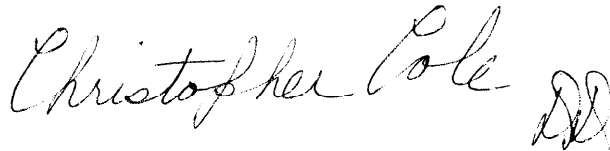
Though small in mileage, the family of pipelines involved is extremely diverse: it represents many small segments with many changes in attributes. These features certainly mean that there will be no "one-size-fits-all" solution to assuring pipeline integrity, and that assuring pipeline integrity for the LDCs will cost significantly more on a per mile basis than it would for a major long-distance pipeline operator.

The above described circumstances strongly indicate that a risk assessment and integrity verification program for the pipelines operated by the NYGAS companies can not take the same form as that which should be established for a typical, large, high-pressure, cross-country transmission pipeline system.

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Thank you for the opportunity to submit these comments. Should you have any questions related to this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Christopher Cole". To the right of the name is a small, stylized monogram or set of initials, possibly "CC".

Christopher Cole
Chairman,
NYGAS Gas Operations Advisory Committee